

January 11, 2017

Commissioner Mignon Clyburn  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

RE: #Solutions2020 Call to Action Plan

The Institute for Local Self-Reliance (ILSR) is a 40 year old nonprofit with the following mission:

*“The Institute’s mission is to provide innovative strategies, working models and timely information to support environmentally sound and equitable community development. To this end, ILSR works with citizens, activists, policymakers and entrepreneurs to design systems, policies and enterprises that meet local or regional needs; to maximize human, material, natural and financial resources; and to ensure that the benefits of these systems and resources accrue to all local citizens.”*

ILSR embraces many of the policy proposals set forth in the current draft release of Commissioner Mignon Clyburn’s #Solutions2020 Call to Action Plan. In particular, ILSR writes to express its support for two policies that empower communities with local control of communication infrastructure.

### **Support Community Networks**

ILSR continues to be a strong advocate for local control of network infrastructure. The Community Networks initiative at ILSR maintains the MuniNetworks.org website that tracks the role of community networks across the country. ILSR strongly supports proposal 2a (Empower Communities to Deploy Communications Infrastructure Where the Market Has Not).

Already, more than 400 communities have some form of publicly owned wired telecommunications infrastructure offering service to local businesses and/or residents.<sup>1</sup> These networks have revitalized local economies, supported education programs, and generated public savings. In rural Georgia, students can use the network to experience live, interactive science demonstrations.<sup>2</sup> In Danville, Virginia, the municipal network has helped attract new businesses, bringing more than 300 jobs to the community.<sup>3</sup>

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<sup>1</sup> <https://muninetworks.org/communitymap>

<sup>2</sup> <https://muninetworks.org/content/community-network-services-cns-brings-stem-education-and-more-rural-southwest-georgia>

<sup>3</sup> <https://muninetworks.org/content/danville-continues-attract-jobs-region-after-building-fiber-network>

For many of these communities, building a municipal network was the only way to ensure that residents would have the connectivity they needed. Historically, small towns and rural areas have seen little investment by the private sector. From electricity to telecommunications, rural small-town America has often been left behind, creating an urban-rural digital divide.

Some communities had sub-par service from incumbent providers and recognized that municipal networks can increase competition, bringing better services and prices to residents. Communities must retain the authority to build networks for themselves. Locals best know their community's own needs.

### **Empower the Office of Native Affairs**

ILSR also expresses support for proposal 2b (Empowering Communities, Ensure Tribal Voices are Heard at the FCC):

*“We must do better in engaging with Tribal governments. To that end, the FCC’s Office of Native Affairs should be empowered as a standalone Office with its own budget that is sufficient to proactively engage with Tribes on important issues of communications policy.”*

High-speed Internet access on Tribal lands has improved in the past few years, but still lags behind most other areas in the U.S. There are more than 500 Federally recognized Tribes and Tribal lands account for about 5 percent of the U.S. land area.<sup>4</sup> Only 10 percent of the entire U.S. population does not have high-speed Internet access, but 41 percent of the population on Tribal lands lacks high-speed Internet access.<sup>5</sup>

In large part, this disparity in Internet access stems from the federal government’s creation of reservations on remote, rural land with inhospitable terrain. Subsequent federal policies also actively undermined economic development on reservations, instead pushing people to relocate to cities. The effects linger today: telecommunications providers often cite the rural locations, rugged terrain, and poverty as barriers to infrastructure deployment on Tribal lands.<sup>6</sup>

Connectivity can empower Tribal nations. Affordable, reliable Internet access will connect folks at home, complement efforts in language revitalization, and enable e-commerce for native-owned businesses. Several Tribal nations have already developed innovative solutions and deployed their own networks.<sup>7</sup> The FCC needs to continue to

<sup>4</sup> <http://www.ncai.org/policy-issues/economic-development-commerce>

<sup>5</sup> Federal Communications Commission, 2016 Broadband Progress Report, FCC 16-6, released January 29, 2016, p. 34, available at <https://www.fcc.gov/document/fcc-releases-2016-broadband-progress-report>.

<sup>6</sup> Government Accountability Office, Additional Coordination and Performance Measurement Needed for High-Speed Internet Access Programs on Tribal Lands, GAO 16-222, January 2016, p. 10-2, available at <http://www.gao.gov/assets/680/674906.pdf>

<sup>7</sup> <http://nationaltribaltelecom.org/Members>

support deployment of high-speed Internet service on Tribal lands by fully supporting the Office of Native Affairs.

Further, the Office of Native Affairs was established to ensure government-to-government consultation with sovereign Tribal nations in matters of communications policy. To this end, the Office of Native Affairs runs programming and workshops on current FCC regulations. The Office of Native Affairs must also ensure active engagement and consultation with Tribal nations when crafting communications policy.

The Office of Native Affairs, however, is currently within the Consumer & Governmental Affairs Bureau and does not have control of its own budget. This is an unnecessary distraction from its duties and undermines its function. The Office of Native Affairs should have its own budget with adequate funding in order to better consult with Tribal nations on matters of communications policy.

### **Conclusion**

ILSR urges the continued support of policies that ensure communities have local control of their communications infrastructure. The FCC must continue to respect the sovereignty of Tribal nations by enabling the Office of Native Affairs to perform its duties. Tribal lands need affordable, high-speed connectivity. The FCC must also reaffirm the role of municipal networks in providing local benefits to communities across the U.S. The inclusion of both of these items in the #Solutions2020 Call to Action Plan is an excellent step toward these goals.

Respectfully,

Hannah Trostle

On behalf of the Community Broadband Networks Initiative at ILSR